

State of California



Fair Political Practices Commission

P.O. BOX 807 • SACRAMENTO, 95804 • • • 1100 K STREET BUILDING, SACRAMENTO, 95814

Technical Assistance/Administration

(916) 322-5660

Executive/Legal

322-5901

Enforcement

322-6441

Conflict of Interest

322-6444

May 22, 1978

78-05-122

James Radoumis
Secretary-Manager
Kern County Board of Trade
2101 Oak Street
Bakersfield, California 93302

Dear Mr. Radoumis:

Thank you for your recent letter in which you asked whether or not the Kern County Board of Trade could arrange a Kern Products Dinner in Sacramento for legislators and state officials.

As I explained to you on the phone last week, the Political Reform Act does not prevent the Board of Trade from arranging for such a dinner provided that no lobbyists are involved in the arrangements. You indicated to me that no lobbyist would be participating in this program.

I also told you that if any member of the Board of Trade employed a lobbyist or made expenditures of \$250 or more to influence legislative or administrative action that such a member would have to disclose any payments of \$25 or more for the function. (See Government Code Section 86109) Finally, if the dinner and gifts total \$25 or more per person attending, each official will be required to disclose the gift on his or her Statement of Economic Interest.

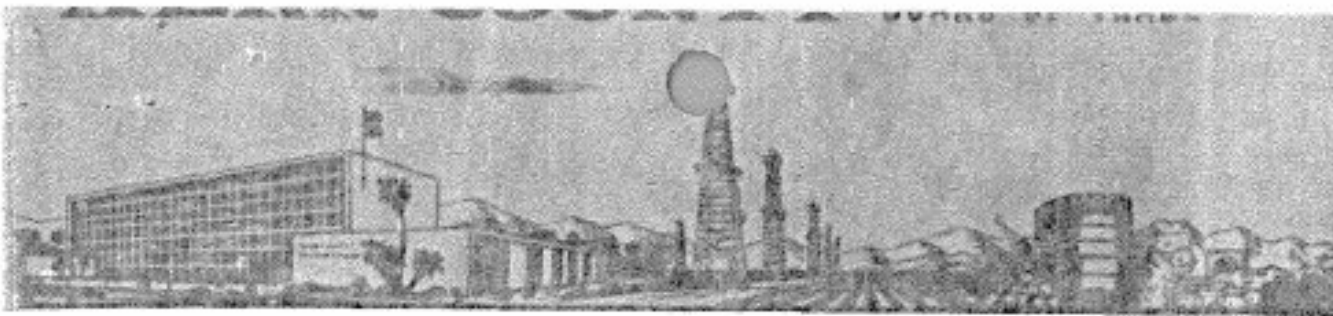
Please call on me if you have any further questions.

Sincerely,

Robert M. Stern

Robert M. Stern
General Counsel

RMS:nc



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April 14, 1978

Fair Political Practices Commission
1100 Kay Street
Sacramento, California 95814

Dear Commissioners:

In past years, the Kern County Board of Trade worked with Sen. Stiern's office and the county's state legislative representatives in arranging a Kern Products Dinner in Sacramento for Constitutional officers, legislators and their spouses. About 160 attended.

This program proved valuable in bringing to the attention of the Legislature and the administration the many fine products of our County and their importance to the State's economy, providing them an unusual opportunity to meet many of our officials, and helping them to better understand some of our problems.

Most of the products were contributed to the Board of Trade for the dinner, specifically, bare root rose plants by Armstrong Nurseries, potatoes by Western Growers Association, dairy products by Carnation and Wayne's Dairies; steaks by Kern County Cattlemen's Association (although the Board of Trade sometimes paid for the steaks), almonds by California Almonds, lettuce, asparagus, carrots and peas by various Kern County growers, and wine by area wineries. The County provided certain items, such as bread, rental of a hall, preparation of the food, and food service.

A reception preceded the dinner and that cost was borne by utilities, banks, local newspaper, growers.

Board of Trade Directors have expressed an interest in reactivating the dinner program, and would like your guidance in meeting the requirements of the law. The Board of Trade is an economic development organization funded by the County of Kern, and its activities are promotional and economy-building in nature and not to influence legislation.

We look forward to hearing from you soon. Thank you.

Sincerely,

JAMES RADOUMIS
Secretary-Manager

JR/wh

"California's Golden Empire"